

Wong&Guerrero.Ind

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FILED
DISTRICT COURT OF GUAM
FEB 16 2005 *mla* ①
MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM

05-00013

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAILY WONG and
MARVA J. GUERRERO,

Defendants.

CRIMINAL CASE NO. _____

INDICTMENT

**CAUSING THE FAILURE TO
FILE A CURRENCY
TRANSACTION REPORT**

[18 U.S.C. § 2, 31 U.S.C. § 5324(a)(1)
& 5322(a), and 31 C.F.R. §§ 103.11 &
10.22]

THE GRAND JURY CHARGES:

**CAUSING THE FAILURE TO FILE A CURRENCY
TRANSACTION REPORT**

On or about May 27, 2004, the District of Guam, the defendants herein, MAILY WONG and MARVA J. GUERRERO, did knowingly and willfully and for the purposes of evading the reporting requirements of Section 5313(a) of Title 31, United States Code and the regulations promulgated thereunder, cause a domestic financial institution, to-wit: First Hawaiian Bank, at which they purchased seven (7) cashiers checks, each in the amount of \$9,880, for \$69,260 cash, to fail to file with the Internal Revenue Service a report required to be filed under Section 5313(a) of 31 United States Code and the regulations promulgated thereunder, 31 Code of

1 Federal Regulations, Section 103.22, in connection with the receipt, exchange, withdrawal and
2 transfer of United States currency in excess of \$10,000,

3 ALL IN VIOLATION OF Title 18, United States Code, § 2, and Title 31, United States
4 Code, §§ 5324(a)(1) & 5322(a), and 31 C.F.R. §§ 103.11 & 10.22.


5 Dated this 16th day of February, 2005.

6
7 A TRUE BILL.


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Foreperson

11 LEONARDO M. RAPADAS
12 United States Attorney
Districts of Guam and CNMI

13
14 By:


15 KARON V. JOHNSON
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16 Approved:

17
18
19 
20 RUSSELL C. STODDARD
First Assistant U.S. Attorney